

IN THE CIRCUIT COURT OF THE ELEVENTH
JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE
COUNTY, FLORIDA

GV NBV LLC

CIRCUIT CIVIL DIVISION

CASE NO.: 2025-024822-CA-01

Plaintiff,

v.

6345 JV LLC,
6345 MANAGER LLC, and
MICHAEL STERN

Defendant,

PLAINTIFF'S INITIAL DISCLOSURE

Plaintiff, GV NBV, LLC (collectively referred to as “GV NBV” or “**Plaintiff**”), pursuant to Florida Rule of Civil Procedure 1.280, by and through the undersigned counsel, hereby files its Initial Disclosure.

A. **Witnesses:** The following individuals are likely to have discoverable information that Plaintiff may use to support its claims. Contact information is provided to the extent known and not privileged.

Person	Subject of Testimony
Michael Stern	Has general personal knowledge of the allegations pled in Plaintiff's Complaint.
Segar Desai	Should have general personal knowledge of the allegations pled in Plaintiff's Complaint. Should have knowledge about representations made by Stern in connection with the Casablanca Project, the "business plan", terms and/or identities of other investors, purchase offers, and the like.

William Chouraqui	Has general personal knowledge of the allegations pled in Plaintiff's Complaint.
Record Custodian for JP Morgan Chase Bank, N.A.	Has information concerning signatories to relevant bank accounts, wire confirmations, payments, etc. Will also have information about the disposition of the \$35,000,000.00 misappropriated and/or misdirected from another project, as well as banking information about the funds of other development projects.
Jamie Tarich	Handled certain real estate closings and has personal knowledge about how said closings were capitalized.
Julius Trump	Should have information about Defendants' capital structure, representations, viability of the Casablanca project, valuation and other matters of similar nature germane to the allegations of Plaintiff's claims.
Records Custodian and Corporate Representative Newmark Commercial Real Estate LLC	Would have information about the February 2025 appraisal and Defendants' circulation of same. May also have knowledge about past and current market value of Casablanca Project as well as Defendants' capital structure.
Records Custodian and Corporate Representative of The Trump Group	Should have information about Defendants' capital structure, representations, viability of the Casablanca project, valuation and other matters of similar nature germane to the allegations of Plaintiff's claims.
Records Custodian and Corporate Representative of Dezer Development LLC	Should have information about Defendants' capital structure, representations, viability of the Casablanca project, valuation and other matters of similar nature germane to the allegations of Plaintiff's claims.
Records Custodian and Corporate Representative Sculptor Real Estate Acquisitions LP	Will have information about capital structure and financial disclosures made on affiliated development projects.
Records Custodian and Corporate Representative Sculptor Capital Management, Inc.	Will have information about capital structure and financial disclosures made on affiliated development projects.

Records Custodian and Corporate Representative Walker & Dunlop	Will have information about capital structure and financial disclosures made on affiliated development projects.
Aaron Appel	Will have information about capital structure and financial disclosures made on affiliated development projects.
Sean Bastian	Will have information about capital structure and financial disclosures made on affiliated development projects.
Corporate Representative and Records Custodian for Skygate Growth Strategies I LLC	Will have information about any capital raised, financial disclosures and how any capital was deployed.
Corporate Representative of GV NBV LLC	Has general knowledge of issues of this case.
Corporate Representative and Records Custodian for 6345 JV LLC	Has general knowledge of issues of this case.
Corporate Representative and Records Custodian for 6345 Manager LLC	Has general knowledge of issues of this case.
Corporate Representative and Records Custodian for Schecher Group Inc.	Will have financial information relative to the Casablanca project as well as financial disclosures made by Defendants, valuation, etc.
Corporate Representative and Records Custodian 6345 Activate MB LLC	Will have financial information relative to the Casablanca project as well as financial disclosures made by Defendants, valuation, Defendants capital structure, etc.
Corporate Representative and Records Custodian for City National Bank of Florida	Will have financial information relative to the Casablanca project as well as financial disclosures made by Defendants, valuation, and information relating to any loans that were given in connection with the Casablanca Project.
Corporate Representative and Records Custodian of Adams Gallinar, P.A.	Handled contract negotiations and closings; believed to have personal knowledge about Casablanca project; believed to have knowledge about disclosures and non-disclosures relevant to this case.
Other lenders and equity investors with knowledge of Stern/JDS's "projects"	

B. **Documents:** Plaintiff identifies the following categories of documents and tangible things that it may use to support its claims:

- a. Wire transfer confirmations confirming \$2,500,000 was sent to bank account titled to 6345 JV LLC
- b. Defendants' corporate records.
- c. Defendants' tax records.
- d. Appraisals and other documents concerning valuation(s) of the Casablanca Project and underlying real estate.
- e. Defendants' banking records.

C. **Damages:** Plaintiff seeks the following categories of damages (amounts to be supplemented as discovery continues):

- a. No less than \$2,500,000.00,
- b. Pre and post judgment interest, costs, and attorney's fees,
- c. Where permitted, punitive damages.

D. **Insurance Agreements:** Unknown.

Respectfully submitted,

/s/ Jason B. Giller

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***Counsel for Plaintiff,
GV NBV LLC***

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of December, 2025, a true and correct copy of the foregoing has been furnished via an automated email generated by the Florida Courts E-Filing Portal and thereafter forwarded via E-Filing to all parties of record, or, as applicable, mailed to each Defendant which has not designated an email for services as of this filing.

/s/ Jason B. Giller

Jason B. Giller, Esq.

Fla. Bar No: 77441